

# Supreme Court of Pennsylvania

## Court of Common Pleas Civil Cover Sheet

WASHINGTON

County

For Prothonotary Use Only:

Docket No:

2018-6037

2018 OCT 26 PM 12:08  
PROTHONOTARY  
WASHINGTON CO. PA

FILED

ATTY PCL  
\$137.75

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

### Commencement of Action:

- ☐ Complaint ☒ Writ of Summons ☐ Petition  
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

Christopher Phillips

Lead Defendant's Name:

Majestic Hills, LLC

Are money damages requested? ☒ Yes ☐ No

Dollar Amount Requested: ☐ within arbitration limits  
☒ outside arbitration limits  
(check one)

Is this a Class Action Suit? ☐ Yes ☒ No

Is this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney:

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

**Nature of the Case:** Place an "X" to the left of the **ONE** case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

### TORT (do not include Mass Tort)

- ☐ Intentional  
☐ Malicious Prosecution  
☐ Motor Vehicle  
☐ Nuisance  
☐ Premises Liability  
☐ Product Liability (does not include mass tort)  
☐ Slander/Libel/Defamation  
☒ Other: Negligence

### CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff  
☐ Debt Collection: Credit Card  
☐ Debt Collection: Other  
  
☐ Employment Dispute: Discrimination  
☐ Employment Dispute: Other  
  
☐ Other:

### CIVIL APPEALS

- Administrative Agencies  
☐ Board of Assessment  
☐ Board of Elections  
☐ Dept. of Transportation  
☐ Statutory Appeal: Other

- ☐ Zoning Board  
☐ Other:

### MASS TORT

- ☐ Asbestos  
☐ Tobacco  
☐ Toxic Tort - DES  
☐ Toxic Tort - Implant  
☐ Toxic Waste  
☐ Other:

### REAL PROPERTY

- ☐ Ejectment  
☐ Eminent Domain/Condemnation  
☐ Ground Rent  
☐ Landlord/Tenant Dispute  
☐ Mortgage Foreclosure: Residential  
☐ Mortgage Foreclosure: Commercial  
☐ Partition  
☐ Quiet Title  
☐ Other:

### MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration  
☐ Declaratory Judgment  
☐ Mandamus  
☐ Non-Domestic Relations Restraining Order  
☐ Quo Warranto  
☐ Replevin  
☐ Other:

### PROFESSIONAL LIABILITY

- ☐ Dental  
☐ Legal  
☐ Medical  
☐ Other Professional:

IN THE COURT OF COMMON PLEAS OF WASHINGTON COUNTY, PENNSYLVANIA

**CHRISTOPHER PHILLIPS and  
ELIZABETH PHILLIPS**

**CIVIL DIVISION**

Plaintiffs,

No. 2018-6037

vs.

**MAJESTIC HILLS, LLC; NVR, INC. d/b/a  
RYAN HOMES; PENNSYLVANIA SOIL  
AND ROCK INCORPORATED; MARK R.  
BRASHEAR; ALTON INDUSTRIES, INC.;  
JOSEPH N. DENARDO d/b/a J.N.D.  
PROPERTIES; and SHARI DENARDO**

**PRAECIPE FOR WRIT OF  
SUMMONS**

**Filed on behalf of Plaintiffs:**  
Christopher and Elizabeth Phillips

Defendants.

**Counsel of Record for this Party:**  
Jeffrey P. Myers, Esquire  
Pa. I.D. No. 90677

Joshua D. Brown, Esquire  
Pa. I.D. No. 315339

Myers Law Group, LLC  
17025 Perry Highway  
Warrendale, PA 15086  
724-778-8800 (Telephone)  
724-779-9650 (Facsimile)

IN THE COURT OF COMMON PLEAS OF WASHINGTON COUNTY, PENNSYLVANIA

**CHRISTOPHER PHILLIPS and  
ELIZABETH PHILLIPS**

**CIVIL DIVISION**

Plaintiffs,

No. 2018-6037

vs.

**MAJESTIC HILLS, LLC; NVR, INC. d/b/a  
RYAN HOMES; PENNSYLVANIA SOIL  
AND ROCK INCORPORATED; MARK R.  
BRASHEAR; ALTON INDUSTRIES, INC.;  
JOSEPH N. DENARDO d/b/a J.N.D.  
PROPERTIES; and SHARI DENARDO**

Defendants.

**PRAECIPE FOR WRIT OF SUMMONS**

To: PROTHONOTARY

Kindly issue a WRIT OF SUMMONS IN A CIVIL ACTION in the above-captioned matter against Majestic Hills, LLC; NVR, Inc. d/b/a Ryan Homes; Pennsylvania Soil and Rock Incorporated; Mark R. Brashear; Alton Industries, Inc.; Joseph N Denardo d/b/a J.N.D. Properties; and Shari Denardo.

The amount in controversy greater than FIFTY THOUSAND (\$50,000.00) DOLLARS.

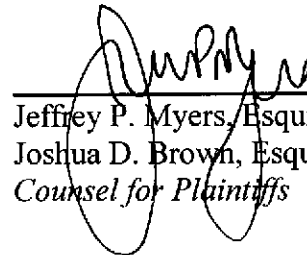
Thank you.

Respectfully submitted,

MYERS LAW GROUP, LLC

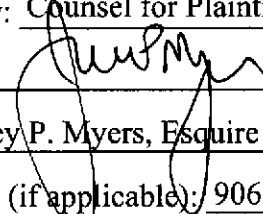
Date: October 26, 2018

By:

  
\_\_\_\_\_  
Jeffrey P. Myers, Esquire  
Joshua D. Brown, Esquire  
*Counsel for Plaintiffs*

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Counsel for Plaintiffs  
Signature:   
Name: Jeffrey P. Myers, Esquire  
Attorney No. (if applicable): 90677

# The Commonwealth of Pennsylvania

## County of Washington

CHRISTOPHER PHILLIPS and  
ELIZABETH PHILLIPS

Plaintiffs,

VS

SUMMONS – CIVIL ACTION  
NO. 2018-6037

MAJESTIC HILLS, LLC; NVR, INC. d/b/a  
RYAN HOMES; PENNSYLVANIA SOIL  
AND ROCK INCORPORATED; MARK R.  
BRASHEAR; ALTON INDUSTRIES, INC.;  
JOSEPH N. DENARDO d/b/a J.N.D.  
PROPERTIES; and SHARI DENARDO

Defendants.

To: MAJESTIC HILLS, LLC; NVR, INC. d/b/a RYAN HOMES; PENNSYLVANIA SOIL  
AND ROCK INCORPORATED; MARK R. BRASHEAR; ALTON INDUSTRIES, INC.;  
JOSEPH N. DENARDO d/b/a J.N.D. PROPERTIES; and SHARI DENARDO:

You are notified that CHRISTOPHER PHILLIPS and ELIZABETH PHILLIPS,  
the Plaintiffs, have commenced a WRIT OF SUMMONS against you.

Date 10-26-2018

*Joy Schury Ranko*

Prothonotary

*Sandra D. Bedillion*

Deputy Prothonotary

**JOY SCHURY RANKO, PROTHONOTARY**  
**My Term Expires First Monday in January, 2020**

No. 2018-6037

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CHRISTOPHER PHILLIPS and  
ELIZABETH PHILLIPS

Plaintiffs,

VS

MAJESTIC HILLS, LLC; NVR, INC. d/b/a  
RYAN HOMES; PENNSYLVANIA SOIL  
AND ROCK INCORPORATED; MARK R.  
BRASHEAR; ALTON INDUSTRIES, INC.;  
JOSEPH N. DENARDO d/b/a J.N.D.  
PROPERTIES; and SHARI DENARDO

Defendants.

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WRIT OF SUMMONS

Issued on 10-26-2018

Jeffrey P. Myers, Esquire

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Attorney for Plaintiff  
17025 Perry Highway  
Warrendale, PA 15086

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